

FROM PLAINTIFF'S - Sandra L. Cullum and Deidre Saleh, et. al.

- Ms. Sandra L. Cullum, 2770 West 5th Ave Apt#7A. Brooklyn, NY 11224, Tel#6462295032
Email: sbrwnsugah@aol.com
- Ms. Deidre Saleh, 2675 W 36th St., Apt. 1E., Brooklyn, NY 11224, Tel#: 347-244-2753;
Email: deedee403@gmail.com

CC: Attn The Honorable, Laura T. Swain (Presiding) & Sarah Netburn (Referral), United States Magistrate Judge:
Pro Se Intake Unit, U.S. District Court, Southern Distr. of New York, 40 Foley Sq., Rm 105, New York, NY 10007
Email: temporary_pro_se_filing@nysd.uscourts

Case No: 22-CV-09700
Request Docket Inputs:
PLAINTIFF'S MOTION REQUEST
FORMAL DOCUMENTED
KEY SETTLEMENT OFFER
PRESENTED TO THE DEFENDANT'S
URGENT AND MATERIAL MOTION

TO: DEFENDANT'S - WYNDHAM HOTELS & RESORTS CORP. ET AL

- Mr. Geoffrey A. Ballotti, President & Chief Exec. Officer (CEO) Wyndham Hotels & Resorts, Corp., D.B.A. Wyndham Corporate Office & Headquarters aka Wyndham Corp. & the
- Wyndham Destinations Hotels (WH) & Resorts, Inc., Ms. Elisabeth Gale, dba Wyndham Corp.
- Wyndham Hotels & Resorts Corporation & Wyndham Destinations, Inc.:
aka Travel & Leisure Co.
- Broadridge Corporate Issuer Solutions, Office & Headquarters

Wyndham Hotels & Resorts Corp. et. al.Party I

- **Mr. Geoffrey A. Ballotti, President & Chief Exec. Officer (CEO)**
Wyndham Hotels & Resorts Corporation
22 Sylvan Way
Parsippany, NJ 07054, Tel# 973-753-6000

Party II

- **Wyndham Hotels (W.H.) & Resorts, Corp. D.B.A.**
Wyndham Corporate Office & Headquarters,
Attn: Wyndham Hotels & Resorts Corporation
22 Sylvan Way
Parsippany, NJ 07054, Tel# 973-753-6000

Party III

- **Wyndham Destinations**
6277 Sea Harbor Drive
Orlando, FL 31821
Attn: Elisabeth.Gale@wyn.com
Office: 800 251 8736 & Fax: 407 626 6328

Party IV

- **Agent: Broadridge Corporate Issuer Solutions**
Broadridge Corporate Issuer Solutions
P.O. Box 1342
Brentwood, NY 11717
T: 877-456-5394 & F: 215-553-5402

Caitlin Conklin, K&L Gates LLP

One Newark Center, 10th Floor

Newark, NJ 07102

973-848-4049 & 973-848-4001 (fax)

caitlin.conklin@klgates.com

Assigned: 03/09/2023 LEAD ATTORNEY TO BE

NOTICED representing

Defendant - Wyndham Hotels & Resorts Corp. et. al.

Attn: Lawrence Bluestone, Genova Burns, LLC

973-535-4434

lbluestone@genovaburns.com

Assigned: 12/22/2022

LEAD ATTORNEY

ATTORNEY TO BE NOTICED representing

Broadridge Corporate Issuer Solutions (Defendant).

Attn: Cynthia P. McNutt, Genova Burns LLC

494 Broad Street

Newark, NJ 07102

973-533-0777

cmcnutt@genovaburns.com

Assigned: 12/20/2022

ATTORNEY TO BE NOTICED representing

Broadridge Corporate Issuer Solutions (Defendant).

Suspense Date Requested: 6 Oct. 2023 due back, kindly, or derived date if the court seeks to advocate for a new time period back to the Plaintiff, from the Defendant for consideration of the Offer Response.

Subject: Urgent/Important Settlement Offer - Final

Dear Honorable Judge Netburn and Judge Swain, Esteemed Members of the Pro Se Intake Office, SDNY Federal Court.

We, the Plaintiffs in the matter of case 22cv09700 (SN), write to you with unwavering determination, fortified by an unshakable commitment to justice and guided by the loftiest ethical principles. We approach the court today not merely as litigants but as guardians of truth, defenders of fairness, and champions of the values that underpin the very essence of our legal system. In this solemn missive, we submit a formal Settlement Offer, not as a concession of our rights, but as a powerful proclamation of our unwavering dedication to the ideals of justice, integrity, and accountability. We do so with a fervent belief that our pursuit of a resolution is not a matter of convenience but an imperative driven by our moral obligation to seek redress for the grave injustices that have transpired.

Our mission, honorable members of the court, is to confront systemic wrongdoings, corporate malfeasance, and the infringement upon the rights and dignities of individuals. The burden of our case is not light; it carries with it the hopes and aspirations of countless victims who have been silenced by the overwhelming power of the defendant, Wyndham Hotels & Resorts Corp. et al.

We must underscore a matter of profound significance, one that has been overlooked for far too long. It pertains to a landmark ruling by the United States Supreme Court, a beacon of legal wisdom and the very cornerstone of our jurisprudence. This ruling unequivocally declares that we have not only met but exceeded the rescission guidelines meticulously crafted by the eminent Justice Scalia: Guidelines that predate the three-year statute of limitations imposed upon us, in which we met through the courts, and the record is reflected.

This fact, which cannot and must not be ignored, lays bare the stark disregard for the principles of equity and justice that have thus far defined this case. It demands a reckoning an unwavering commitment from this court to ensure that justice is not a mere abstraction but a living, breathing force that binds us all.

Furthermore, we draw the court's attention to the matter of unconscionability, a word that reverberates with moral indignation. It is a word that speaks to the very heart of this case, a word that underscores the depths to which corporate conduct can plunge when unchecked. We extend an olive branch, offering a chance to right these grievous wrongs, to restore faith in the integrity of commerce, and to bring an end to the suffering of countless souls ensnared in this web of deceit.

However, should the Defendant choose to rebuff our sincere efforts at reconciliation, we humbly ask this court to recognize the inherent legal merit of our foundational position. We do so not out of care or any amount of respect, but out of the unwavering belief that justice is blind and that it is the solemn duty of this court to ensure that justice is not only done but seen to be done. And to assist those who need it in a timely manner, the defendant has told anyone how they are sending harassing letters and making massive calls to Plaintiffs.

In the annals of history, there are moments that demand more from us, moments when we are called upon to rise above the ordinary and uphold the values that define us as a society. This, esteemed members of the court, is such a moment. It is a moment when we must refuse to be swayed by expediency & refuse to be cowed by the trappings of power.

Our case is not merely a legal dispute; it is a real impact of our Plaintiff's testament to the resilience of the human spirit, a testament to the indomitable will of individuals who refuse to be victimized by the machinations of the powerful. It is a call to action, a call to justice, and a call to uphold the principles that our legal system was designed to protect.

We acknowledge that this is not a simple matter of contractual dispute; it is a matter of trust betrayed, of livelihoods jeopardized, and of families torn asunder. It is a matter that resonates deeply with the values that define us as a nation—a nation that cherishes fairness, integrity, and the sanctity of individual rights.

We beseech this court to recognize the urgency of this matter, to understand that the wheels of justice must not grind slowly when the rights of individuals hang in the balance. The burden of resolution should not rest solely upon the shoulders of those who have suffered; it should be a shared responsibility, one that this court can help expedite through its wisdom and determination.

Settlement Offer: In the spirit of unwavering commitment to justice, we propose a settlement amount of \$15.6 Billion Dollars, a sum that reflects the gravity of the harm inflicted upon us, the Plaintiffs, and the Class Action Lawsuit. This figure has not been arrived at lightly; it is a figure that takes into account not only the financial losses but also the emotional toll, the reputational damage, and the erosion of trust that has transpired.

Furthermore, we insist upon the termination of all existing contracts and agreements between consumers and the defendant, Wyndham Hotels & Resorts Corp. et al., as a crucial step toward severing ties resulting from illegal and fraudulent practices. This is not a demand born out of vindictiveness but out of a solemn obligation to ensure that justice is not only served but that it is seen to be served.

To rectify the systemic issues that have allowed these injustices to persist, we earnestly request:

1. Acceptance of the Offer Settlement: Acknowledgement of the \$15.6 Billion Dollar settlement to the victims (Plaintiffs) directly, via formal written letter to the Plaintiffs.
2. Consumer Protection and Fair Business Practices: A solemn commitment to the rigorous adherence to consumer protection laws and fair business practices, ensuring transparency and honesty in all dealings with consumers.
3. Credit Reports Corrections: With all impacted Consumers, Plaintiffs, and Class Action suits that are correcting the credit reports and restoring full faith to the consumers, honoring active employment to resolve this matter in a professional manner.
4. Class Action Suit Resolution: An expedited process for addressing the Class Action suit and providing remedies to all affected parties.
5. Elderly Citizen Protection: Rigorous measures to safeguard the rights and well-being of elderly citizens, ensuring that they are shielded from any further harm.
6. Full Compliance to a CEASE & DESIST: Of all Consumer threatening and harassing, & any amounts of harassment occurring via any means: via phone & letters reference to the calls daily, of asking for more money from consumers.
7. Independent Auditing: A comprehensive, independent audit of the Defendant's financial practices, conducted by a reputable auditing firm selected by the Plaintiffs.
8. Public Statement: A public statement from the Defendant, acknowledging wrongdoing and committing to rectify the situation.

In the pursuit of justice, we remain open to constructive dialogue and negotiation. We are resolute in our quest for a just and equitable resolution that upholds the highest ethical standards and serves as a beacon of hope for all who seek justice.

In conclusion, we beseech the court to afford this matter the urgency and gravity it deserves by formally endorsing and filing this Settlement Offer into the official case docket. We stand ready to cooperate fully with the court and the defendant to expedite a resolution that brings solace to the aggrieved, restores faith in justice, and upholds the principles upon which our legal system was founded. Reminder of the Suspense Date Requested: 6 Oct. 2023 due back, kindly, or derived date if the court seeks to advocate. With unwavering resolve, we await your feedback in hopes of working together, and having a Wonderful Blessed Day. This is our Good Faith Offer to you as Defendants to accept our Request.

With unwavering resolve, I simply would be devoid if I didn't restate the obvious. I hope & pray for a viable anticipated thorough response that acknowledges the significance and urgency of our proposal, accompanied by a commitment to finalize the settlement agreement expeditiously and addressing our concerns. So, by accepting this offer, You as Defendants - Wyndham Corporation et. al., can avoid the burdensome legal process and demonstrate your dedication to accountability, consumer protection, and ethical business practices as consumers are not wanting to be cheated we seek to stand united. Thank you for your immediate attention to this matter. We as a Group remain available should you require any further clarification or additional information, I remain available for further clarification or additional information as needed. We believe this settlement offer is a path towards a resolution and is well regarded as more than responsible & accountable. As a collective effort, we patiently await your response.

Lastly, valuing our entire legal position to speak up is a right, we have and from the founding of this great Nation, we speak with varied voices as we are all United. Let's come together, just as the U.S. has thirteen original colonies did, why because it had E Pluribus Unum which has thirteen letters in it. The phrase ex pluribus unum goes back to ancient times. E Pluribus Unum still appears on U.S. Coins even though it is no longer the official national motto! The United States Congress gave that honor to In God We Trust in 1956, by an Act of Congress ref., the U.S. Code (36 U.S.C. § 302). As every dollar we have paid with has a journey, it has been hard work & long tireless days of labor; from the cotton fields of northern Florida panhandle, South Carolina orange enriched fields of rich dirt & orange tobacco clay mounds to the plains of Georgia and colonies of the north enriched at the industrial age to areas the entire nation who have been impacted of western NY to the NYC City we are United. We are Everyday People, daily late night workers, long days, seeking a better way of life, giving our last to feed others and nourish their minds, and caring for hearts we love and our children, even those we don't know, it's in our fabric of our DNA for a better tomorrow. All for so many families and the sick to have their blessings, of their nourishment, & for their bodies. Again, just don't forget we are supposed to be a Nation of Caring People first doing what's right, & leaders second, & Humanity always, & filled with rightful approaches to all be E Pluribus Unum is Latin for "Out Of Many, One." We as Plaintiffs, believe this is the way, we have a nation of tears, I hope you understand and feel our tireless efforts; these are real lives of people who are and have been impacted. This is our Good Faith Offer to you as Defendants: WYNDHAM HOTELS & RESORTS CORP. ET AL. As Plaintiffs we will await your feedback in hopes of working together, and have a Wonderful Blessed Day.

Respectfully & Sincerely,

Sandra Cullum

Plaintiffs, | Ms. Sandra L. Cullum,

Deirdre L. Saleh

Plaintiffs, | Ms. Deirdre L. Saleh